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February 18, 2025

*VIA ECF*

Honorable Renée Marie Bumb  
United States District Court  
Mitchell H. Cohen Building and  
U.S. Courthouse  
Courtroom 3D  
4<sup>th</sup> and Cooper Streets  
Camden, New Jersey 08101

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability  
Litigation*, MDL No. 19-2875 (RMB)

Dear Chief Judge Bumb:

Attached hereto is a revised proposed Common Benefit Order, submitted by Plaintiffs to be considered with Plaintiffs' pending motion for a common benefit Order ([ECF 2960](#)). The Plaintiffs and Defendants have engaged in an extensive meet and confer process, and have agreed on all of the edits.

We are available to answer any questions or address any issues raised by the Court.

Honorable Renée Marie Bumb  
United States District Court  
February 18, 2025  
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Thank you for your courtesies and consideration.

Respectfully,

A handwritten signature in purple ink, appearing to read "Adam M. Slater", written over a horizontal line.

ADAM M. SLATER

Encl.

Cc: All counsel of record (via ECF)